

**HAFP-0056-District of Columbia
Treasury Feedback for Resubmission of
Plan**

Please revise the HAF plan by providing a response to the question(s).

Completeness

The participant's response(s) to the following questions was/ were either incomplete or unresponsive:

- Your plan lists Drew Hubbard as the Authorized Official, while the original application for HAF payments was signed by Muriel Bowser. To ensure prompt payment upon approval, the Authorized Official needs to be the same as the signatory on the original application for HAF payments. If you need to establish a new authorized representative for HAF payments, a request should be submitted by email to HAF@treasury.gov.
 - A request has been submitted and the District of Columbia is working with Treasury IT to align everything in the HAF portal. District of Columbia City Administrator, Kevin Donahue should now appear as the authorized representative for HAF payments and is also the authorized official on the HAF plan and assurance of compliance with civil rights.

Homeowner Needs and Community Engagement

Data

- No questions

Community Engagement and Public Participation

- Please provide an update indicating any public comments you have received since you submitted your HAF Plan, from which organization you received any such comment, and whether you have responded to the comments.
 - The District of Columbia has not received additional comments to the plan since submitting it.

Ongoing Assessment of Homeowner Need

- No questions

Program Design

- Will there be a method in your HAF program, early in the process of engaging with a household, to evaluate immediate threats to the housing stability of applicants, which may need to be addressed under an expedited or prioritized timeline (e.g. HOA liens,

tax delinquencies, utility shut off)?

- The District's program will be supported by housing counselors, and the application will have fields asking about threats to housing stability such as foreclosure notices, tax sales, scheduled court dates, and/or utility shut-offs. The application is designed to describe the threats in text and upload relevant documents.
- The above information may be used to prioritize application review for those households with scheduled court hearings. Housing counselors and HAF program documents also refer households to resources for legal and immediate financial assistance programs.
- Please describe how your program will utilize housing counselors or legal services to assist homeowners in evaluating loss mitigation options available for their mortgage. Your description should include:
 - whether your program will connect homeowners with housing counseling or legal services early in the process.
 - The District of Columbia already funds 11 (of 14 total) community-based housing counseling and legal organizations, using CDBG and other non-HAF sources. These organizations are currently able to assist homeowners in evaluating loss mitigation options available for their mortgage and will also be a potential entry point for connecting with HAF assistance.
 - Applicants who access the HAF portal directly, and not through a housing counselor or legal services provider, are notified of these services through the application chat feature, appointment scheduling with housing counselors, as well as in targeted content of emails notifying the applicant of HAF application status. This is currently being tested in our HAF-Pilot program.
 - In addition, applications that indicate threats to housing stability or suggest opportunities for mitigation will be proactively referred to these organizations.
 - the role housing counseling or legal services providers will play in supporting homeowners' efforts at engaging in loss mitigation.
 - As noted above, the District of Columbia currently funds 11 housing counseling and legal aid organizations that can assist homeowners in assessing their mitigation strategy. In our plan, we are reserving the opportunity to implement the Mortgage Default Resolution Program Element but will not implement it immediately. If this is implemented, our housing counseling and legal services partners will conduct these activities and will have clear guidance on how HAF assistance is to be used in sequence with other loss mitigation strategies.

- How will your program avoid using HAF funds in ways that duplicate relief that available loss mitigation options might provide?
 - The application will explicitly ask about additional relief being requested or already received; applicants will attest that they will not receive duplicate funding. Specific language states:
 - “I/We attest that my/our household is not receiving, and has not received, other federal or non-federal benefits or assistance for the same housing costs for the same period of time for which assistance is being requested. In the event that I/we do receive such duplicate assistance, I/we agree to immediately notify the District of Columbia Department of Housing and Community Development (“DHCD”) of such additional amounts and understand that DHCD, in its sole discretion, shall determine if such additional amounts constitute a duplication of benefits that must be repaid to DHCD.”
 - The application review will utilize records of programs to which the District of Columbia or its partners have access to further limit the risk of duplication of relief assistance.
 - Agreements with mortgage servicers, utilities and third parties will be explicit about how to handle multiple payments for the same charge.
 - The District of Columbia will conduct a post-payment review and have a process for reporting concerns about payments similar to what is currently used for its federal Emergency Rental Assistance program.

- Please explain what steps, if any, your program will take to assist the homeowner in determining whether a HAF-resolution will result in a sustainable monthly payment?
 - In our plan, we are reserving the opportunity to implement the Mortgage Default Resolution Program Element though we are not implementing it immediately. If this element is implemented, DHCD will develop a post-homeownership training course for HAF applicants to assist homeowners in making the best choices about their home and its finances in their current situation and in the future. Additionally, our housing counseling and legal services partners will conduct a full review and determination of the applicants budget and finance options prior to recommending HAF-resolution.

- Are you anticipating increased winter home energy costs and their potential impact on the homeowners that HAF will serve?
 - We are aware of the possibility for this to affect homeowners and our budget for assistance. We will monitor this closely and coordinate with the District Department of Energy and the Environment and the other utility assistance plans offered by utilities and the District of Columbia to assist households as efficiently as possible.

Eligibility

- No questions.

Outreach

- Please explain how the program will target outreach and provide access to homeowners with limited English proficiency.
 - The program will reach the Spanish speaking population of the District of Columbia by advertising in Spanish in a variety of Spanish-speaking media including radio (El Zol), print (El Tiempo), and television (Telemundo44) and will use the Mayor's Office of Latino Affairs to assist with connections to community-based organizations that serve the Spanish-speaking community.
 - For the languages other than Spanish we will rely on communications through the Mayor's Office of Asian and Pacific Islander Affairs and the Mayor's Office of African Affairs that are connected in the limited English proficiency communities they serve and will promote the program among those groups.
 - The program has established a dedicated "Language Line" for applicants and housing counselors to utilize specifically for the HAF Pilot Program. The Pilot Program's online application allows the applicant to select English or Spanish and will include the following languages by December 17, 2021: Amharic, Korean, Mandarin, Vietnamese, and French.
- Please explain how the program will provide culturally relevant marketing.
 - The HAF program will utilize lessons learned from marketing the Emergency Rental Assistance program and will receive assistance from the Mayor's Offices of Latino Affairs, Asian and Pacific Islander Affairs, and African Affairs. This includes creating marketing materials that use culturally relevant terminology, feature appropriate persons, and are located in appropriate areas both physically and digitally.

Prioritization

- If your program intends to serve households who are over the 100% AMI threshold, how will your program prioritize Socially Disadvantaged Individuals? Please describe your marketing and outreach strategy to SDI communities.
 - The primary focus of the District of Columbia's HAF program will be households below 100% of AMI with an emphasis on SDI households in all program elements. Only the mortgage reinstatement program will be available to higher income households. Households above 100% of AMI will need to provide a written attestation of social disadvantage as well as documentation of income below 150% of AMI.
 - The District of Columbia will target media advertisements, by working with outlets to restrict advertising to SDI and lower-income households and will use

outreach strategies such as door-to-door and telephone calls to inform neighborhoods and institutions serving a high proportion of SDI individuals, primarily Black and other non-White and non-English speaking households.

- The District of Columbia will also work with and support the city's community-based organizations serving these communities in spreading the word.

Performance Goals

- Please explain how you intend to communicate your progress towards performance to the public.
 - The District of Columbia plans to use government websites, press releases and events to communicate progress and the program's performance as well as the continued availability of assistance.
- Please indicate which three metrics will serve as the best indicators of the success of your program.
 - Number of households assisted
 - Number of households assisted by Income
 - Number of households assisted by SDI status
- Please indicate whether you intend to disaggregate metrics by income, race, gender, etc.
 - Yes – the District of Columbia will disaggregate by race, gender and other SDI categories as the data are available.
- Please consider including as an additional metric the number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of HAF funds to resolve the homeowner's defaults or delinquencies.
 - The District of Columbia will ask HAF-funded legal aid and housing counseling organizations to track this information, but we note that our HAF program will be piggy backing on our existing housing counseling and legal services funding. Therefore, we anticipate using a relatively small portion the HAF funds for this purpose.

Readiness

- Please provide the most recent available information about your program's readiness, including staffing, contractors, etc..
 - Through our HAF-Pilot program we will be ready to assist households with the currently available services from day one when funding is announced. With increased funding we will work to quickly expand the services and the population the program serves. We have already begun hiring to fill needed roles internally and are in regular communications with our community-based organizations and legal aid organizations about program progress. Rolling out new services such as utility assistance using HAF funds may take a little longer,

though based on the experience and capacity developed for the Emergency Rental Assistance Program funds, we do not anticipate a significant delay.

- Is your program prepared to launch upon approval and, if not, by what date will you be ready to launch following approval?
 - As described above, our program will build off our pilot and is prepared to undertake a staged launch immediately upon approval
- Please provide updated information about your progress in spending the initial 10% payment from your jurisdiction's full allocation and the status of any pilot assistance already offered or made available to homeowners.
 - The HAF Pilot Program covers past-due mortgage and other property-related charges (condo fees, insurance, taxes). Applicants must meet the following eligibility criteria:
 - Own a condominium in DC in zip codes 20019, 20020, 20024, and 20032 as their primary residence; and
 - Purchased the property using down payment and/or closing cost assistance from DHCD; and
 - Are behind on their mortgage or other property-related payments (such as condo fees, property taxes, and homeowner insurance); and
 - Are at or below 100% AMI.
 - The Pilot Program launched on September 15, 2021 with more than 700 outreach letters mailed to current DHCD borrowers in targeted zip codes. The application portal opened October 1, 2021, accepting applications in both English and Spanish. As of December 9, 2021, nearly 250 individuals have expressed interest in the program, with 141 passing initial screening questions and 95 submitting applications. These applications are currently under review and in coordination with applicants for corrections, if needed.
 - To date, payments have been made to two community based organizations for their housing counseling, application intake/review, and technical assistance services. One of the organizations is working with DHCD on the application portal and vendor payment process. Payment pathways are in development to mortgage servicers, condo associations, and other relevant parties, but no payments have been disbursed.
- Your plan's budget indicates \$500,000 allocated to Payment Assistance for Down Payment Loans, though this program design element has not been indicated as one you are offering. Please confirm that you intend to offer this program, and if so, please provide term sheet information.
 - The District of Columbia sees this element as an activity in an eventual Mortgage Default Resolution Program element, where the District of Columbia would pay or pay-down these loans to reduce debt burden on the way to directly reducing monthly payments or refinancing the property. As noted in the HAF plan, the District of Columbia does not intend to launch a

Mortgage Default Resolution Program element unless it becomes clear that the reinstatement and other emergency program elements are underutilized and/or these programs in combination with existing loss mitigation and counseling programs are unable to sustainably address what should be able to be viable owner-occupancies. It seems the easiest thing to do is to adjust our current budget for this activity to zero and adjust our term sheets. This has been addressed in the resubmitted budget.

- Under HAF guidance, up to 5% of HAF funds that a participant receives may be allocated to Counseling or Legal Services. Your budget allocates \$2,900,000.00, or 5.8% of the total funds available to the District of Columbia, \$50,000,000.00. Please adjust your allocation for housing counseling and legal services reflect the 5% cap or \$2,500,000.
 - This was an error and the budget has been adjusted.